

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION
Criminal No.: 22-CR-207 (JRT/ECW)**

| | | |
|---------------------------|---|-----------------------------------|
| United States of America, |) | |
| |) | |
| Plaintiff, |) | DEFENDANT’S MOTION TO |
| |) | SUPPRESS EVIDENCE OBTAINED |
| |) | AS A RESULT OF |
| Justin White, |) | SEARCH AND SEIZURE |
| |) | |
| Defendant. |) | |

Defendant, Justin White, by and through his attorney, James M. Ventura, respectfully moves the Court pursuant to Rule 12, Federal Rules of Criminal Procedure, to suppress any physical evidence obtained as a result of a search and seizure of the controlled substances and firearms on the following grounds:

1. That any search warrant or seizure order issued in this case was issued without a sufficient showing of probable cause in the supporting affidavit, and was therefore issued in error by the United States Magistrate Judge and that the search warrant or seizure order involved was executed in an illegal and unlawful manner, and not in good faith.
2. That any searches and seizures were conducted without warrant, without probable cause, and lacking in any exigent circumstances.

This Motion is based upon the Indictment, the records, and files in the above-entitled action, and any and all matters which may be presented prior to, or at the time of the hearing of said Motion.

Dated: September 23, 2022

Respectfully submitted,

/s/ James M. Ventura

James M. Ventura (#147217)
1000 Twelve Oaks Center Drive, Suite 100
Wayzata, Minnesota 55391
Telephone: (952) 473-8064
Facsimile: (952) 475-7042
jventura@jamesventuralaw.com
Attorney for Defendant Justin White